

Samantha N. Hoffman (SBN 212135)  
Rassa L. Ahmadi (SBN 287576)  
JACKSON LEWIS P.C.  
200 Spectrum Center Drive, Suite 500  
Irvine, CA 92618  
Tel: (949) 885-1360  
Fax: (949) 885-1380  
HoffmanS@jacksonlewis.com  
Rassa.Ahmadi@jacksonlewis.com

Ashley B. Abel (*Pro Hac Vice*)  
JACKSON LEWIS P.C.  
15 South Main Street, Suite 700  
Greenville, SC 29601  
Tel: (864) 232-7000  
Fax: (864) 235-1381  
AbelA@jacksonlewis.com

Attorneys for Defendants  
PFIZER INC. and MEDIVATION, INC. 2015 SEVERANCE PLAN

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO/OAKLAND DIVISION

DAVID FORER,

Plaintiff,

v.

PFIZER INC., MEDIVATION, INC.  
2015 EMPLOYEE SEVERANCE  
PLAN,

Defendants.

) CASE NO.: 3:17-cv-05997-EMC

) [Related to Case No. 17-cv-04851-EMC]

) **STIPULATION AND PROPOSED ORDER**  
) **RESOLVING PLAINTIFF DAVID FORER'S**  
) **JOINDER TO MOTION FOR SUMMARY**  
) **JUDGMENT AS TO STANDARD OF REVIEW**

) Hearing: March 15, 2018

) Time: 1:30 p.m.

) Courtroom: 5, 17<sup>th</sup> Floor

) Judge: Hon. Edward M. Chen

Pursuant to Northern District of California Local Rule 7-12, Plaintiff David Forer ("Plaintiff") and Defendants Pfizer Inc. ("Pfizer") and Medivation, Inc. 2015 Severance Plan (the "Plan") (collectively, the "Parties"), agree to resolve Plaintiff David Forer's Joinder to Motion for Summary Judgment as to Standard of Review (ECF No. 43 in *Sampath v. Pfizer Inc., et al.*) by the following stipulation:

1. The Parties agree and stipulate that the Court's standard of review will be *de novo* based on the administrative record.

2. The Parties further stipulate that Plaintiff David Forer's Joinder to Motion for Summary Judgment as to Standard of Review (ECF No. 43 in *Sampath v. Pfizer Inc., et al.*) is now moot.

**IT IS SO STIPULATED.**

Dated: February 22, 2018

ROBERTS BARTOLIC LLP

By: s/Michelle Lee Roberts  
Michelle Lee Roberts  
Attorneys for Plaintiff  
DAVID FORER

Dated: February 22, 2018

JACKSON LEWIS P.C.

By: s/Samantha N. Hoffman  
Samantha N. Hoffman  
Rassa L. Ahmadi  
Ashley B. Abel (*Pro Hac Vice*)  
Attorneys for Defendants  
PFIZER INC. and MEDIVATION, INC. 2015  
SEVERANCE PLAN

**ORDER**

The Parties having so stipulated and good cause appearing, it is hereby ORDERED as follows:

1. That the Court's standard of review will be *de novo* based on the administrative record.

2. Plaintiff David Forer's Joinder to Motion for Summary Judgment as to Standard of Review (ECF No. 43 in *Sampath v. Pfizer Inc., et al.*) is moot and will be removed from the hearing calendar for March 15, 2018.

**IT IS SO ORDERED.** CMC reset from 1:30 p.m. to 9:30 a.m. on 3/15/18.

Dated: 2/28/18

